

13 February 2013

Dear Colleague

Response by UKCIP to the review of Government planning practice guidance

UKCIP was established in 1997 to assist organisations to adapt to the unavoidable impacts of a changing climate. It is part of the Environmental Change Institute at the University of Oxford. UKCIP has developed a strong reputation for working at the interface between policy, research and practice, developing pioneering approaches to adapting to climate change.

Currently, UKCIP is working with researchers in the UK and internationally to promote robust, evidence-led adaptation to climate change. This includes providing the Adaptation and Resilience in a Changing Climate Coordination Network (ARCC CN), which brings together the work of over 25 UK research projects with a focus on built environment and infrastructure. ARCC CN researchers, through UKCIP, have recently worked with DCLG to provide technical input into the delivery of Green Deal advice on overheating.

Good planning policy is an essential tool for adaptation. It provides a framework within which communities, organisations and individuals can plan and deliver measures that will keep homes, businesses and public services safe and resilient in response to the impacts of climate change.

The proposal to move planning guidance online, and the offer of an always-up-to-date guidance package is ambitious, but would provide better access for all to this essential information.

UKCIP has responded specifically to just two of the consultation questions.

Question 8

UKCIP welcomes the commitment to climate change adaptation already made in the National Planning Policy Framework where it has a high priority, firmly within one of the three main roles of the Framework. This review will support this commitment by providing the opportunity to incorporate adaptation to climate change consistently in all relevant elements of the guidance. UKCIP looks forward to supporting DCLG to make this happen.

UKCIP would like to see how interdependencies and social justice will be addressed within the planning practice guidance, particularly in the context of adaptation. UKCIP is familiar with emerging work in both these areas, through its ARCC CN activities and also via other research projects relating to social justice. There will be specific opportunities to explore the themes of interdependencies and social justice in the priority areas referred to in recommendation 18 of Lord Taylor's report, as well as within the proposed case studies.

UKCIP would also like to see clarity on how adaptation will be considered in any assessment of its proportionality (also referred to in recommendation 18 of Lord Taylor's report). Where there is a balance to be struck between competing and diverse demands it will be important that these decisions are seen to be made in a just and transparent manner. This will be the case for a number of policy areas, not only adaptation, so it will be important to have some clarity on how the principle of proportionality will be applied in practice. Furthermore, UKCIP would welcome the opportunity to consider with DCLG opportunities for incorporating guidance on applying transformational, as well as incremental, adaptation. Revisions to existing practice may

be insufficient, for example, to deal with extreme events. Transformational adaptation – where radical changes may be necessary – requires a high level of adaptive capacity with the support of effective guidance and examples.

Question 9

While UKCIP considers that it is important that examples of good practice are available and shared, we have concerns, particularly when the examples are managed independently by a number of third parties. Examples need to be up-to-date, with current contact information and some indication of transferable lessons or practice. Transferability can be enhanced by ensuring that full information is provided, including details of the context and why specific decisions were taken, as well as exploring the nature of the evaluation.

In our experience, it can be difficult to determine ‘good’ practice. For adaptation, success is often judged by an absence of negative impacts (e.g. as a result of flooding or overheating) which would only be likely to occur infrequently or at some future point, thus caution needs to be exercised over the labelling of ‘good’ or ‘best’ practice. These judgements are often case- and evaluator-specific, but can also be time limited. It would be helpful to include information on why and for whom each example has been identified as ‘good’ practice, and the context under which it has been identified as such. It will be important to establish a framework within which the examples can demonstrate their evaluation methodology, so that readers can assess how effectively it might transfer to other situations.

I hope that you find these comments helpful, and UKCIP would be happy to explore these issues further as the review process continues.

Yours sincerely



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